

DANIEL G. BOGDEN  
United States Attorney  
District of Nevada  
SARAH E. GRISWOLD  
Assistant United States Attorney  
333 Las Vegas Boulevard South  
Suite 5000  
Las Vegas, Nevada 89101  
702-388-6336  
Fax: 702-388-6418

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

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IT IS HEREBY STIPULATED AND AGREED between the parties, Daniel G. Bogden, United States Attorney for the District of Nevada, Sarah E. Griswold, Assistant United States Attorney, counsel for the United States, and Rene Valladares, Federal Public Defender, and Raquel Lazo, Assistant Federal Public Defender, counsel for defendant JOHN DOE, a.k.a. Arnold Malone, a.k.a. Leon Elmes, that this Court issue an Order protecting from disclosure to the public any discovery documents containing the personal identifying information such as social security numbers, drivers license numbers, dates of birth, or addresses, of participants, witnesses and victims in this case. Such documents shall be referred to hereinafter as “Protected Documents.” The parties state as follows:

1       1. Protected Documents which will be used by the government in its case in chief  
2 include personal identifiers, including social security numbers, drivers license numbers, dates of  
3 birth, and addresses, of participants, witnesses, and victims in this case.

4       2. Discovery in this case is voluminous. Many of the documents include personal  
5 identifiers. Redacting the personal identifiers of participants, witnesses, and victims would  
6 prevent the timely disclosure of discovery to defendants.

7       3. The United States agrees to provide Protected Documents without redacting the  
8 personal identifiers of participants, witnesses, and victims.

9       4. Access to Protected Documents will be restricted to persons authorized by the  
10 Court, namely defendant, attorney(s) of record and attorneys' paralegals, investigators, experts,  
11 and secretaries employed by the attorney(s) of record and performing on behalf of defendant.

12       5. The following restrictions will be placed on defendant, defendant's attorney(s)  
13 and the above-designated individuals unless and until further ordered by the Court. Defendants,  
14 defendants' attorneys and the above-designated individuals shall not:

- 15       a. make copies for, or allow copies of any kind to be made by any other person of  
16              Protected Documents;
- 17       b. allow any other person to read Protected Documents; and,
- 18       c. use Protected Documents for any other purpose other than preparing to defend  
19              against the charges in the Superseding Indictment or any further superseding  
20              indictment arising out of this case.

21       6. Defendant's attorney(s) shall inform any person to whom disclosure may be  
22 made pursuant to this order of the existence and terms of this Court's order.

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1       7. The requested restrictions shall not restrict the use or introduction as evidence of  
2 discovery documents containing personal identifying information such as social security  
3 numbers, drivers license numbers, dates of birth, and addresses during the trial of this matter.

4       8. Upon conclusion of this action, defendant's attorney(s) shall return to  
5 government counsel or destroy and certify to government counsel the destruction of all  
6 discovery documents containing personal identifying information such as social security  
7 numbers, drivers license numbers, dates of birth, and addresses within a reasonable time, not to  
8 exceed thirty days after the last appeal is final.

9 DANIEL G. BOGDEN  
United States Attorney

10  
11 /s/ Sarah E. Griswold  
SARAH E. GRISWOLD  
12 Assistant United States Attorney

April 29, 2015  
DATE

13  
14 RENE VALLADARES  
Federal Public Defender

15  
16 /s/ Raquel Lazo  
RAQUEL LAZO  
17 Assistant Federal Public Defender  
Counsel for JOHN DOE, a.k.a. Arnold Malone,  
18 a.k.a. Leon Elmes

April 29, 2015  
DATE

19  
20                   **ORDER**

21 IT IS SO ORDERED this 29th day of April, 2015.

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24 UNITED STATES MAGISTRATE JUDGE